

CH2MHILL

Notes from May 2002 BCT Meeting Navy's CNC BCT Office, Charleston, SC

PREPARED FOR:

Charleston Naval Complex BCT

PREPARED BY:

Richard Garcia

DATE:

May 16, 2002

The May 2002 BCT Meeting was held at the Navy's CNC BCT office in Charleston, South Carolina. The meeting began at 1300 hrs on Tuesday, May 14, 2002, and concluded at 1100 hrs on Wednesday, May 15, 2001.

The meeting began with introductions of team members, agenda review, and action item review. Two new individuals were introduced at the meeting: Ms. Sara Lee from the Navy and Mr. John Becker, from EPA. They were both sitting as an observant.

Steve Parker provided a map and sediment sample results collected along Noisette Creek for information purposes and as a result of previous discussions at early BCT meetings regarding AOC 721.

Tuesday, May 14, 2002

Update on Field Activities

CH2M-Jones provided an update on field activities at the following sites:

SWMU 39, 2 and 42: Additional delineation of the plume was performed in April using DPT and Geo Probe. Latest round of sampling has been completed. The analytical data is in but has not been plotted to date.

<u>SWMU 38</u>: Two activities are taking place at this site: one area will be receiving hydrogen peroxide injection in June and a dig and haul of PCBs is scheduled this week in another area.

<u>SWMU 196</u>: Dean briefly explained the progress and the different possible outcome scenarios from the ChemOx treatment at this site. He indicated that two treatments have been completed to date. Paul Favara is looking at performing one more round of injection.

<u>SWMU 25/70</u>: Dean indicated that sampling of wells was performed in April to evaluate the results of the injection of zero valent iron (ZVI) into the groundwater targeting the reduction of hexavalent chromium. Preliminary indications show that a rebound has occurred. The data in presently under evaluation.

<u>SWMU 166</u>: Dean stated that wells were sampled in April, injectors are being installed this week, well development is scheduled for next week, and injection is planned to begin the last week in May.

SWMU 3: Additional soil samples were collected this week.

SWMU 6/7/635: Sampling and analysis (SAP) plan and addendum to phase II SAP was issued this period. Sampling performed the first week in May.

<u>SWMU 605/5/18</u>: IM work plan issued this period. Work on removing the concrete slab may begin this month.

AOC 633: An IM Work Plan was developed and submitted this week to DHEC to address LNPLs at the site.

AOC 561: Injection of hydrogen peroxide is scheduled for June.

<u>AOC 607</u>: Dean W. provided a slide presentation of this site. The presentation covered information regarding site conditions, plume, remediation system, data indicating heating of soils and results to date. The system continues to remove product at a rate of $\frac{1}{2}$ to 1 pound per day. The system is scheduled to remain active until June, except for the North area, which appears to be reaching cleanup goals in that area. This area may be shut down sooner.

Background and Pesticides

A discussion regarding background levels and arsenic along rail lines was lead by Dann Spariosu and Dean Williamson. Dean presented evidence from historic drawings of rail lines that were located at or near AOC 530/531. CH2M-Jones has not been able to identify a source for the arsenic and assumes that arsenic-containing pesticides may have been used along rail lines. A discussion as to regulatory exceptions for pesticides took place. Dann did not believe that pesticides were covered by the exception and that it needed to be treated as a CoC. He sited the Cecil Field Base as an example of the pesticide exception not being applicable and he offered to research this matter.

David S. from DHEC stated that DHEC typically prefers to see reference concentrations developed for issues such as this by sampling areas possibly impacted, such as typical fence lines. Dann S. suggested that risk assessment, exposure based concentrations, and LUCs should be used to resolve this specific AOC. Dean agreed to evaluate this site based on these criteria and discuss with Vijaya. Tony will provide a copy of the Navy's opinion about whether the pesticide exception applies to areas such as golf courses.

RAB preparation

The agenda for the RAB meeting was briefly discussed. Gary planned to address AOC 607, provide an update as to the status of the Phase III EBS/FOST, and provide an update of deliverables.

An update for the upcoming August NAID conference will be requested from the RAB members.

Total Dissolved Solids

Jack Gelting briefly outlined some recent administrative changes within DHEC. He stated that Susan Bird will have the responsibility of evaluating all risk assessment issues associated with this base and that he will be serving as POC for the hydrogeologist's in order to streamline some decision-making within their organization. He also suggested that the Project Manual be updated on a more regular basis.

Jack then provided a brief presentation regarding total dissolved solids, including the following points:

- The criteria defining an Underground Source of Drinking Water 10,000 PPM.
- MCL's for inorganic constituents may not apply in areas were values exceed 10,000-PPM TDS.
- Other routes of exposure should be evaluated on a case-by-case scenario, such as eco-exposure.
- Organics should be treated using risk-based data.

He indicated that the agency used the 10,000-PPM criterion recently when they issued a NFA status to SWMU 106. He stated that this was not a change to the groundwater classification status. He also provided a set of GIS figures indicating high and low levels of TDS at shallow and deep aquifers. A copy of these drawings will be furnished by DHEC to Tony.

It was also discussed that the criteria should be used as a tool on specific sites that meet these guidelines.

Phase III EBS/FOST

Gary Foster provided an overview of the status of the project. He presented a map of the Base showing the various target transfer areas for the Phase III FOST/EBS. He also provided a slide presentation illustrating the status of sites within each area. Gary addressed several key sites where the deliverables have been submitted to the Regulators and require approval in order to support their inclusion into the Phase III property transfer. The final configuration of the area to be transferred may be modified from that shown based on the results of these Regulatory reviews.

Wednesday, March13, 2002

RAB Meeting Debrief

It was noted the meeting went well. Part of the meeting focused on a discussion on training a RDA employee to provide hazardous waste management oversight at tenant's facilities. This individual will have the 40 HAZWAP training. THE BCT team will look for ways to assist this individual once the person has been identified and trained. A hotline telephone number from EPA and DHEC could also be provided to assist with questions this individual may have regarding regulatory requirements.

Status of Deliverables and Submittal Tracker Update

A quick review and status of documents under review by DHEC and EPA followed. Gary has submitted to DHEC and EPA a list of critical sites that required review in order to incorporate them into the Phase III EBS/FOST. AOC 666 was noted as one site needing clarification as to the pathway forward.

There was also a discussion regarding sites in Zone E. Gary stated that some sites are being classified as NFA (i.e. without any LUCs) based on the review of the data. Dann expressed some concerns that the data for some sites in this area was reviewed using industrial levels with the understanding that LUCs were to be implemented. Dean indicated that sites seeking NFA were compared to residential criteria. Tony requested that the criteria for justification and types of LUCs begin with CH2M-Jones.

Zone J RFI Status

Charlie Vernoy of Ensafe presented information on the recent Zone J fieldwork effort and review of path forward. He stated that he had recently visited the Corps of Engineers District office to review the current work under Zone J. He also touched on a recent draft memorandum submitted to DHEC and EPA addressing the work plans activities. Comments from the regulators should be issued by the first week in June. The lack of rain has slowed the work in this zone and in order to make up for time lost in the schedule he proposed two approaches: The first approach is to begin a multi-zone work effort that would allowed Ensafe to begin in areas were sufficient background information and data is available. Second, Ensafe would like to begin the site linkage process of CoCs. Members of the BCT requested that he submit his request in writing and that a resolution could be determined at the next BCT meeting in June.

Considerations Related to Groundwater investigations at SWMU 39 – SWMU 2 Area and AOC 707

Tom conducted a presentation regarding the area encompassed by SWMU 39 and SWMU 2. Preliminary results from the recent sampling provide the extent of the plume. The graphics illustrated the Benzene, VC, TCE, and DCE contaminants at various concentrations. A brief discussion regarding the path forward was held. It was agreed that CH2M-Jones could proceed with additional DPT delineation to determine the extent of contamination from SWMU 38 towards SWMU 2. Tom B. will forward a request for additional wells to DHEC.

AOC 707 appears to be a site that had a report issued to DHEC in 1997 but has had no further activity. A copy of this report was provided to DHEC for review.

Project Managers Meeting

This session consisted primarily on an update provided by Robert Ryan of the RDA as to the status of the future of CNC. Projects at CNC that were discussed briefly at the meeting included Building 68 demolition, 234 demolition, Cosgrove improvements, the Noisette project, the Phase III transfer, upgrades to the sewer distribution system, and expansion of the Border Patrol complex.

Tony Hunt also discussed the optioned for an early transfer potentially in the month of December. Most environmental cleanup remedies would be in place and could facilitate

and expedite the transfer. Robert Ryan stated that he would look to DHEC for concurrence. He suggested that the Navy submit a plan in writing to review this request,

Action Items

- EPA to provide document regarding Cecil Field LUCs on golf course area.
- Navy to provide copy of their legal opinion regarding non-applicability of pesticide exception to golf course.
- DHEC to provide comments to incorporate into an updated project notebook.
- CH2M-Jones to check on status of the submittal of additional sampling results at AOC 666.
- Ensafe to prepare written request on next phase of Zone J work activities.
- DHEC to review previous report submittal on AOC 707
- CH2M-Jones to provide updated GIS to DHEC. New version is presently being developed and is under review at CH2M.
- Navy to develop early transfer justification document.

List of Attendees:

U.S. Navy: Rob Harrell, Tony Hunt, Sara Lee

USEPA: Dann Spariosu, John

SCDHEC: Jerry Stamps, Jack Gelting, Paul Bergstrand, Gill Rennhack, and Mansour Malik.

CH2M-Jones: Gary Foster, Dean Williamson, Tom Beisel, and Richard Garcia.

EnSafe: Steve Parker (Tuesday), Barbara Gliaer, and Charlie Vernoy (Wednesday).

Gannett Fleming: Tim Frederick.